

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION OF
THE KINGDOM OF DENMARK
(SKATTEFORVALTNINGEN) TAX REFUND
SCHEME LITIGATION

This document relates to: 19-cv-10713

MASTER DOCKET

18-md-2865 (LAK)

**STIPULATION AND [PROPOSED] ORDER
EXTENDING TIME TO RESPOND TO THE AMENDED COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel for the parties that the current June 29, 2020 deadline for Defendants Richard Markowitz, RJM Capital Pension Plan Trust, John van Merkensteijn, and Bernina Pension Plan Trust to answer the Amended Complaint filed in Case No. 19-cv-10713-LAK is hereby extended for thirty (30) days up to and including July 29, 2020.

No provisions of this Stipulation and Order shall be construed as a waiver of, and Defendants expressly reserve, any and all defenses.

This is the Parties' second request to modify the time to answer or otherwise respond to the Amended Complaint. By order dated May 14, 2020, this Court granted the Consolidated Defendants' request to extend the time to answer or respond to SKAT's new and amended complaints to June 29, 2020. See Dkt. 336.

Dated: New York, New York
June 25, 2020

By: /s/ Allison Stoddart
(*e-signed with consent*)
Allison Stoddart

By: /s/ Marc Weinstein
(*e-signed with consent*)
Marc A. Weinstein
HUGHES HUBBARD & REED LLP

WILMER CUTLER PICKERING HALE AND
DORR LLP
7 World Trade Center
250 Greenwich Street
New York, NY 10007
Telephone: (212) 230-8800
allison.stoddart@wilmerhale.com

*Counsel for Defendants Richard
Markowitz, RJM Capital Pension Plan
Trust*

One Battery Park Plaza
New York, NY 10004
Telephone: (212) 837-6000
Fax: (212) 422-4726
marc.weinstein@hugheshubbard.com

*Counsel for Plaintiff Skatteforvaltningen
(Customs and Tax Administration of the
Kingdom of Denmark)*

By: /s/ Nicholas S. Bahnsen
Nicholas S. Bahnsen
KOSTELANETZ & FINK LLP
7 World Trade Center
New York, NY 10007
Telephone: (202) 740-6999
nbahnsen@kflaw.com

*Counsel for Defendants John van
Merkensteijn, III, Bernina Pension Plan
Trust*

SO ORDERED:

Hon. Lewis A. Kaplan
United States District Judge